

EXHIBIT D

From: R J WiL <reon@wellingtoninvestigations.co.nz>
Sent: Wednesday, November 1, 2023 11:51 AM
To: Eckley M. Keach III
Cc: Brian Williams; Sarah Campbell
Subject: Re: [EXT] Re: Request for Expedited Investigation and Process Service

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Our server set a sign, Placing a small piece of wood from their garden on the trim of the gate used to enter or leave,
in such a way that when opened it wouldn't fall but when closed it would.

He said last night it had fallen.

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Thank you. We've updated the Court. Please continue to attempt service.

Eckley M. Keach III

Counsel | Greenberg Gross LLP

One Summerlin | 1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135
Direct 702.777.0876 | Main 702.777.0888
EKeach@GGTrialLaw.com



Los Angeles | Orange County | Las Vegas | New York

From: R J WiL <reon@wellingtoninvestigations.co.nz>
Sent: Monday, October 30, 2023 9:24 PM
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Subject: Re: [EXT] Re: Request for Expedited Investigation and Process Service

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Will make another attempt later tonight.

Please excuse brevity sent from mobile device:

RJ Viles | Senior Investigator | WIL

Security Technician & Consultant.

NTT Tower, level 16,
157 Lambton Quay,

Mob: 021-562-333
Office; 04-213-9414
Free Call; 0800-787-732

www.wellingtoninvestigations.co.nz

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Mr. Viles,

Attached is a copy of the summons and complaint. Please have your firm serve these personally on Mr. Euringer as soon as possible. If you cannot make service by 10/30, please let me know.

I am also attaching the proof of service form. When your firm accomplishes service on Mr. Euringer, please fill this out and send it to me along with whatever other proof of service documents you ordinarily provide.

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Our locate rate is \$120p/hr, and database is \$85,

Document service fee will be \$380plus gst, and travel is \$1.10km, which I included. affidavit preparation and swearing is \$85.

James appears to be residing in Wellington.

Our rates are plus gst,

Locate, \$445 plus gst

Process serve\$465plus gst, includes travel and affidavit.

Total \$910plus 15% gst,

This is required prior to finalising the locate,

If you wish to proceed I will have office send invoice.

Please excuse brevity sent from mobile device:

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Do you have the respondents address or would you like us to begin tracing them,

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Hello,

My firm represents a plaintiff in a lawsuit arising from the Southern District of New York. The case is Jane Doe 7015 v. Elektra Entertainment Group, Inc., et al., case 1:21-cv-06868-AJN-JEW.

We have been told that one of the named defendants in the case, James Euringer, resides in New Zealand, along with his wife, Chantal. We are seeking the services of an investigator and process server to locate James Euringer and serve him with a copy of the summons and complaint.

We have a deadline to serve Euringer by October 31, 2023. Can you please provide a quote for the cost of your services? We would like to start trying to serve Mr. Euringer on Monday, October 23, 2023, or as soon as possible.

Respectfully,

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Apologies Eckley,

We have been back twice on evening of Friday 3rd Nov and after performing a door knock, agent took up OP, parking illegally to observe the targets apartment, agent noted that the lights on. After about 30mintes agent did see a adult male walk right to left from the lounge to kitchen, then the male

POI believed to be James Euringer

may have seen agent, the male then turned the lights off before walking back from the kitchen.

See photos.

So it's believed the James Euringer is evading service. Our suggestion is to run a morning or 2 surveillance and serve James as he exits the apartment onto the street.

Let us know if you have any questions,

Regards Reon Viles

On Tue, Nov 7, 2023 at 7:43 AM Eckley M. Keach III <EKeach@ggtriallaw.com> wrote:

Mr. Viles.

Can you please provide me with an update on your service attempts and any incurred expenses since our last payment?

Thank you,

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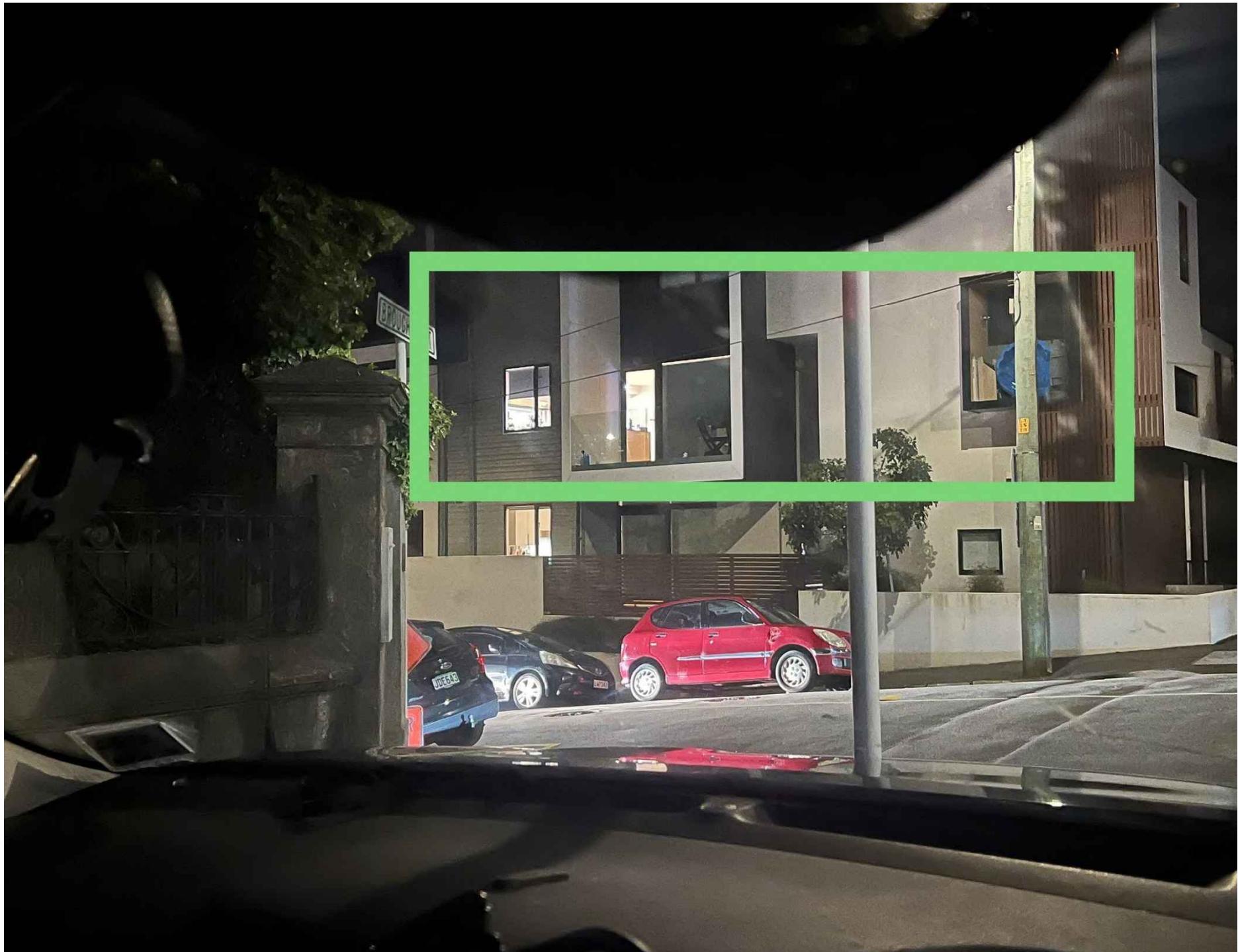


EXHIBIT D



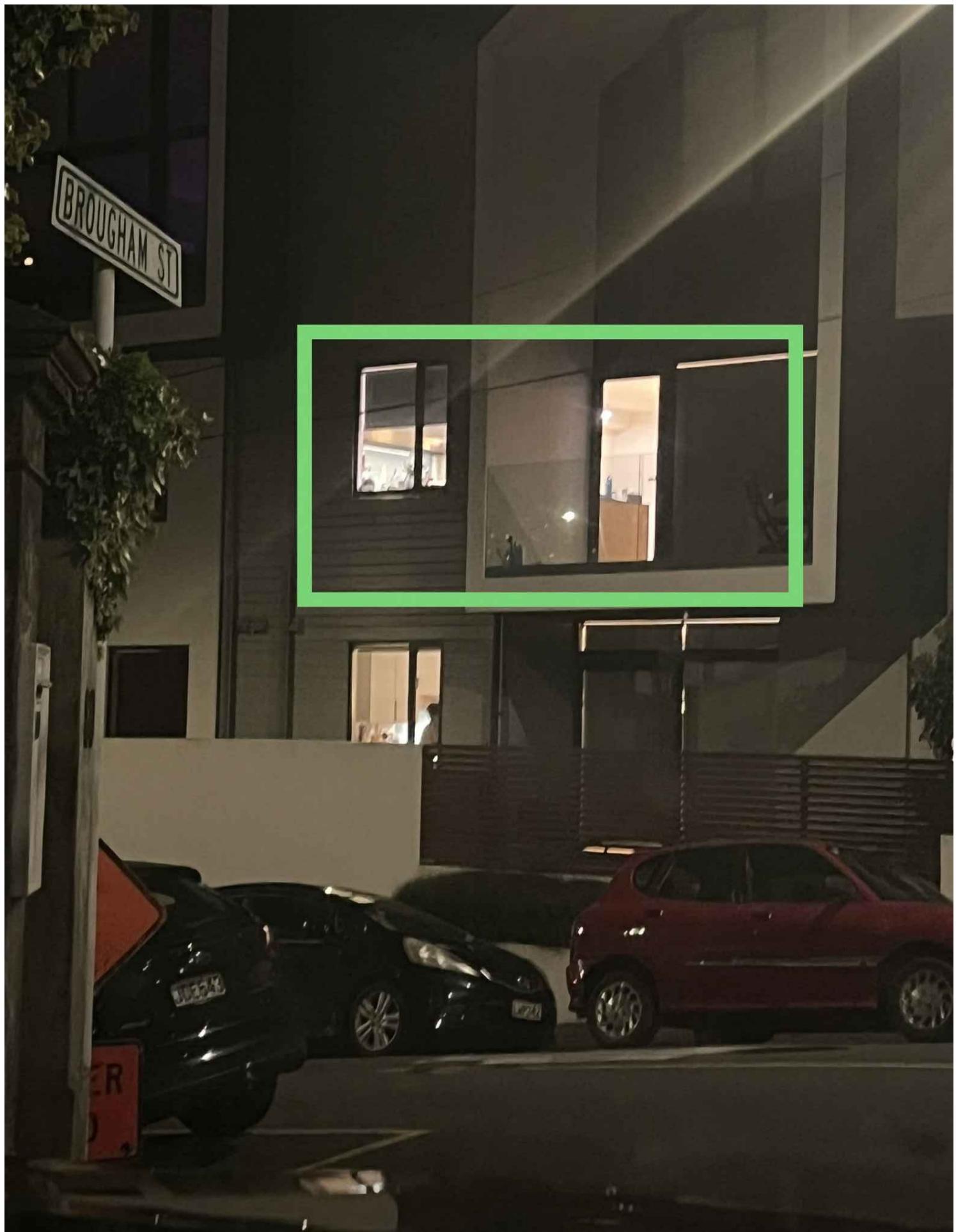
EXHIBIT D





EXHIBIT D

-80-



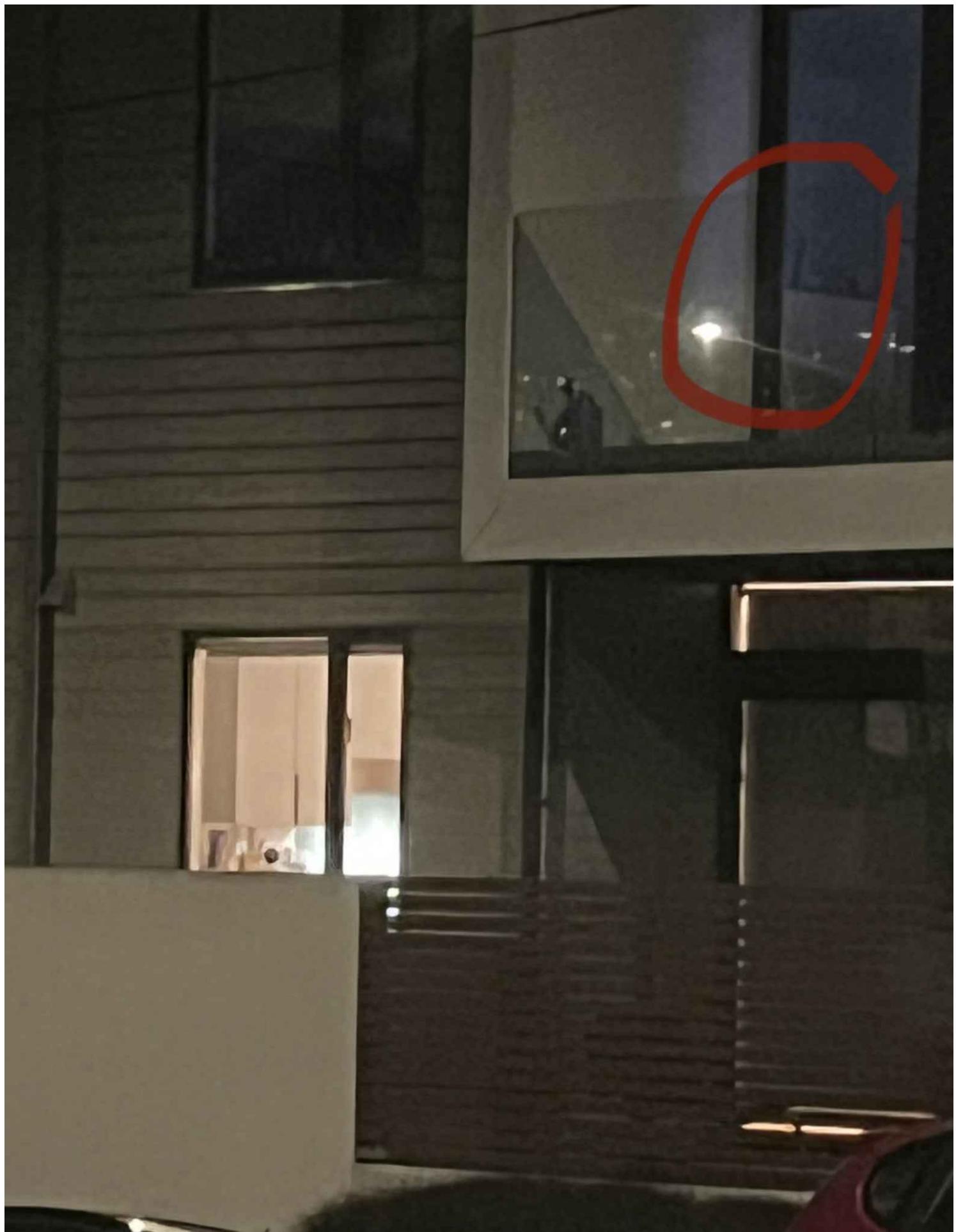
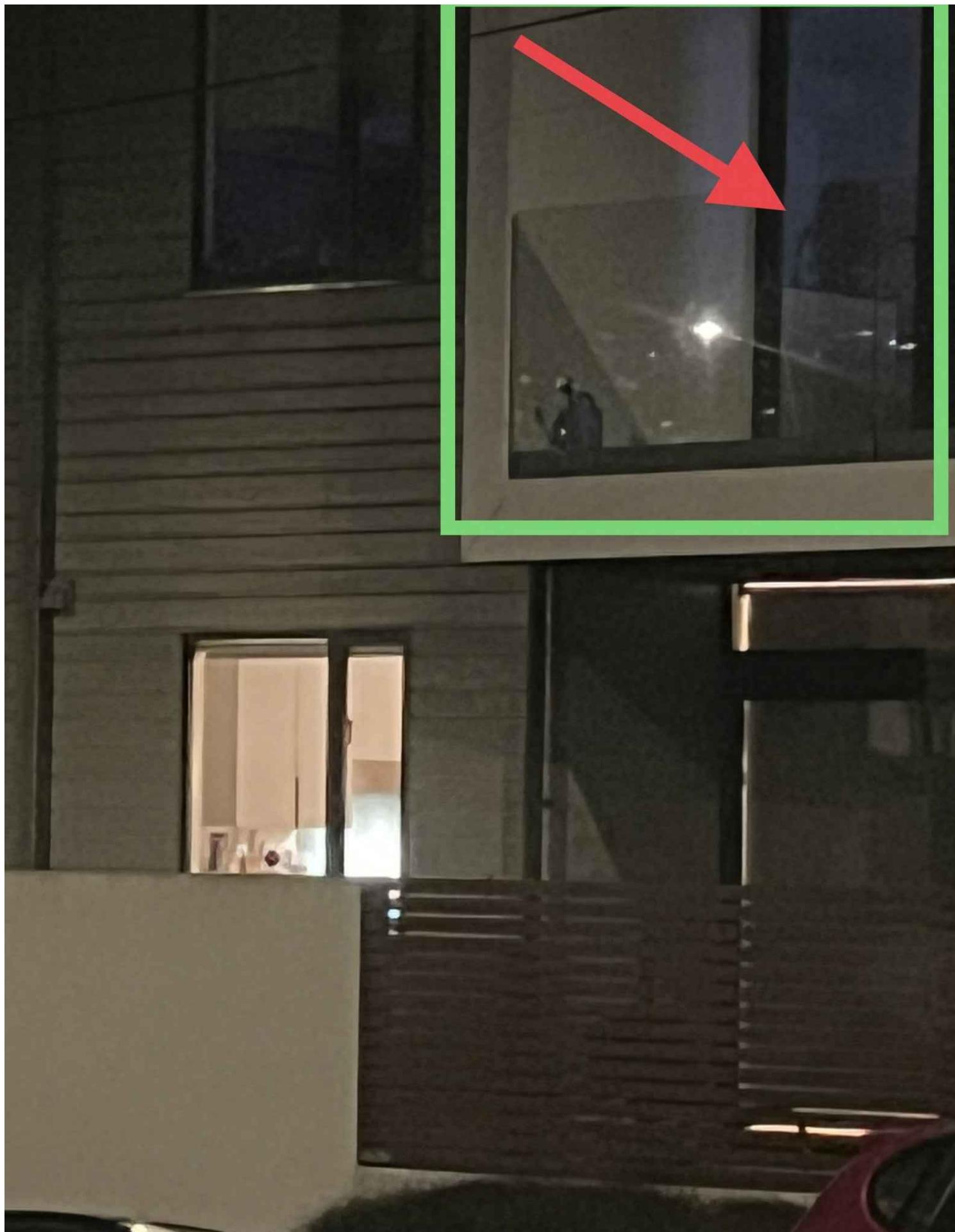


EXHIBIT D







From: R J WiL <reon@wellingtoninvestigations.co.nz>
Sent: Tuesday, November 7, 2023 11:57 PM
To: Eckley M. Keach III
Cc: Brian Williams; Sarah Campbell
Subject: Re: [EXT] Re: Request for Expedited Investigation and Process Service
Attachments: image_67171329.JPG; image_50364929.JPG; image_50436097.JPG; image_67172865.JPG; image_50436865.JPG

Invoice has been sent,

Lucky 🌱 we checked,
white medium sized fluffy dog from 2020 is now a large slim black dog,

Good to know, maybe we aren't the only ones knocking on his door,

Regards Reon Viles

On Wed, 8 Nov 2023 at 15:25, Eckley M. Keach III <EKeach@ggttriallaw.com> wrote:

That's fine. You can go ahead with the 3 hr strategy as discussed.

Thank you,

Eckley M. Keach III

Counsel | Greenberg Gross LLP

One Summerlin | [1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135](https://www.greenberggross.com/)
Direct 702.777.0876 | Main 702.777.0888
EKeach@GGTrialLaw.com



Los Angeles | Orange County | Las Vegas | New York

From: R J WiL <reon@wellingtoninvestigations.co.nz>
Sent: Tuesday, November 7, 2023 5:58 PM
To: Eckley M. Keach III <EKeach@GGTrialLaw.com>
Subject: Re: [EXT] Re: Request for Expedited Investigation and Process Service

3hrs surveillance onsite and 30min travel time each way,

total will be \$545plus gst,

\$626\NZD,

On Wed, Nov 8, 2023 at 2:54 PM Eckley M. Keach III <EKeach@ggttriallaw.com> wrote:

I agree with your strategy and am inclined to follow the 3hr approach, however I will need at least a rough cost estimate before agreeing so that I can receive approval. Once I have that I can confirm our approval of the 3 hrs.

Thanks,

Eckley M. Keach III
Counsel | Greenberg Gross LLP

One Summerlin | [1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135](https://www.greenberggross.com)
Direct 702.777.0876 | Main 702.777.0888
EKeach@GGTrialLaw.com



Los Angeles | Orange County | Las Vegas | New York

From: R J WiL <reon@wellingtoninvestigations.co.nz>
Sent: Tuesday, November 7, 2023 5:50 PM
To: Eckley M. Keach III <EKeach@GGTrialLaw.com>
Subject: Re: [EXT] Re: Request for Expedited Investigation and Process Service

Agreed, We want to time it right,

Our minimum is 2hrs, I'll send an invoice, What we know is

There is a partner Chantel, two young children, They have a dog,!!

So that'll be the achilles heel,

The morning walk with the dog so it can pee.

These pictures I've just found lokk to be taken in the current apartment, The black timber wall panels look very similar,

If I was a betting man, I'd run for 3hrs, from 6.30am-9.30am, If just 2 hours, we get 6.30-8.30am, or 7.30-9.30am,

I'd be disappointed to miss him. To give your client some reassurance if you choose to do 3hrs, and if James isn't sighted walking dog,

I'll do surveillance the following morning at no extra charge,

To sure up the chance to get him, Ill have an agent check the address with a drive by thru the evening tonight,

Thoughts???

On Wed, Nov 8, 2023 at 12:51 PM Eckley M. Keach III <EKeach@ggttriallaw.com> wrote:

Thanks for the update. I agree with your suggestion – hopefully he exits the apartment in the morning.

Eckley M. Keach III
Counsel | Greenberg Gross LLP

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Direct 702.777.0876 | Main 702.777.0888
EKeach@GGTrialLaw.com



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From: R J WiL <reon@wellingtoninvestigations.co.nz>
Sent: Monday, November 6, 2023 6:44 PM
To: Eckley M. Keach III <EKeach@GGTrialLaw.com>
Subject: Re: [EXT] Re: Request for Expedited Investigation and Process Service

Apologies Eckley,

We have been back twice on evening of Friday 3rd Nov and after performing a door knock, agent took up OP, parking illegally to observe the targets apartment, agent noted that the lights on. After about 30mines agent did see a adult male walk right to left from the lounge to kitchen, then the male

POI believed to be James Euringer

may have seen agent, the male then turned the lights off before walking back from the kitchen.

See photos.

So it's believed the James Euringer is evading service. Our suggestion is to run a morning or 2 surveillance and serve James as he exits the apartment onto the street.

Let us know if you have any questions,

Regards Reon Viles

On Tue, Nov 7, 2023 at 7:43 AM Eckley M. Keach III <EKeach@ggtriallaw.com> wrote:

Mr. Viles,

Process Service

Will do, thank you.

Two more attempts were made Wednesday 1st Nov, believing that James and partner may be away.

Our server set a sign, Placing a small piece of wood from their garden on the trim of the gate used to enter of leave, in such a way that when opened it wouldn't fall but when closed it would.

He said last night it had fallen.

we will continue

On Thu, Nov 2, 2023 at 7:30 AM Eckley M. Keach III <EKeach@ggtriallaw.com> wrote:

Thank you. We've updated the Court. Please continue to attempt service.

Eckley M. Keach III
Counsel | Greenberg Gross LLP

One Summerlin | 1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135
Direct 702.777.0876 | Main 702.777.0888
EKeach@GGTrialLaw.com



Los Angeles | Orange County | Las Vegas | New York

From: R J Wil <recon@wellingtoninvestigations.co.nz>
Sent: Monday, October 30, 2023 9:24 PM
To: Eckley M. Keach III <EKeach@GGTrialLaw.com>
Subject: Re: [EXT] Re: Request for Expedited Investigation and Process Service

Yes we are working on it, 4 attempts have been made already, with no one coming to the door, apartment is occupied.

Will make another attempt later tonight.

Mr. Viles,

Attached is a copy of the summons and complaint. Please have your firm serve these personally on Mr. Euringer as soon as possible. If you cannot make service by 10/30, please let me know.

I am also attaching the proof of service form. When your firm accomplishes service on Mr. Euringer, please fill this out and send it to me along with whatever other proof of service documents you ordinarily provide.

Thank you,

Eckley M. Keach III
Counsel | Greenberg Gross LLP

One Summerlin | [1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135](#)
Direct 702.777.0876 | Main 702.777.0888
EKeach@GGTrialLaw.com



Los Angeles | Orange County | Las Vegas | New York

From: R J Wil <recon@wellingtoninvestigations.co.nz>
Sent: Tuesday, October 24, 2023 12:21 AM
To: Eckley M. Keach III <EKeach@GGTrialLaw.com>
Subject: Re: [EXT] Re: Request for Expedited Investigation and Process Service

Apartment 8,

[76 Brougham Street,](#)

[Mount Victoria,](#)

[Wellington,](#)

[New Zealand, 6011](#),,,

On Tue, Oct 24, 2023 at 1:30 PM Eckley M. Keach III <EKeach@ggttriallaw.com> wrote:

Mr. Viles,

I am following up from below. At your earliest convenience, can you please tell me the address that you have identified as belonging to Mr. Euringer so that I may add it to the summons?

Thank you,

Eckley M. Keach III
Counsel | Greenberg Gross LLP

One Summerlin | [1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135](https://www.ggttriallaw.com/contact-us/)
Direct 702.777.0876 | Main 702.777.0888
EKeach@GGTrialLaw.com



Los Angeles | Orange County | Las Vegas | New York

From: Eckley M. Keach III
Sent: Monday, October 23, 2023 11:32 AM
To: recon@wellingtoninvestigations.co.nz
Subject: RE: [EXT] Re: Request for Expedited Investigation and Process Service

Mr. Viles,

Now that we have paid your invoice, can you please tell me the address that you have identified as belonging to Mr. Euringer so that I may add it to the summons?

Thank you,

Eckley M. Keach III
Counsel | Greenberg Gross LLP

One Summerlin | [1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135](#)
Direct 702.777.0876 | Main 702.777.0888
EKeach@GGTrialLaw.com



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From: Eckley M. Keach III
Sent: Monday, October 23, 2023 11:15 AM
To: reon@wellingtoninvestigations.co.nz
Subject: RE: [EXT] Re: Request for Expedited Investigation and Process Service

We have paid your invoice.

I am waiting on the court to return a signed summons for this case. I expect it to be returned either today or tomorrow. As soon as I receive the summons, I will send a copy of it and the complaint to you for personal service on Euringer.

Thank you,

Eckley M. Keach III
Counsel | Greenberg Gross LLP

One Summerlin | [1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135](#)
Direct 702.777.0876 | Main 702.777.0888
EKeach@GGTrialLaw.com



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From: R J WiL <reon@wellingtoninvestigations.co.nz>
Sent: Sunday, October 22, 2023 2:22 PM
To: Eckley M. Keach III <EKeach@GGTrialLaw.com>
Subject: Re: [EXT] Re: Request for Expedited Investigation and Process Service

We will proceed and finalise the locate on James Euringer, I have sent invoice with PayPal link to make payment straight forward. Once received we will make 1st attempt within 72hrs,

Regards Reon Viles

On Mon, 23 Oct 2023 at 08:08,

One Summerlin | [1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135](#)
Direct [702.777.0876](#) | Main [702.777.0888](#)
EKeach@GGTrialLaw.com

Los Angeles | Orange County | Las Vegas | New York

On Oct 21, 2023, at 7:40 PM, R J WiL <reon@wellingtoninvestigations.co.nz> wrote:

I have run a preliminary locate to give you an estimate. We have found historic links to James Euringer with ## Sept 1969 in our database, and several recent articles to go through. Our locate estimate is 3hrs and database access, as we believe we have his current address this just needs to be data matched to confirm,

Our locate rate is \$120p/hr, and database is \$85,

Document service fee will be \$380plus gst, and travel is \$1.10km, which I included. affidavit preparation and swearing is \$85.

James appears to be residing in Wellington.

Our rates are plus gst,

Locate, \$445 plus gst

Process serve \$465plus gst, includes travel and affidavit.

Total \$910plus 15% gst,

This is required prior to finalising the locate,

If you wish to proceed I will have office send invoice.

Please excuse brevity sent from mobile device:

RJ Viles | Senior Investigator | WIL

Security Technician & Consultant.

NTT Tower, level 16,

157 Lambton Quay,

Mob: 021-562-333

Office; 04-213-9414

Free Call; 0800-787-

Government License # 23-103616

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Worldwide Association Member - WASP

Certified Fraud Examiner - Associate Member

Office; NTT Tower, L16, 157 Lambton Quay, Wellington 6011

Postal; Suite 7953, Level 1, 6 Johnsonville Rd, Wellington 6037

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RJ Viles | Senior Investigator | WIL

MOJ Licensed Security Consultant & Technician

Government License # 23-103616

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Certified Fraud Examiner - Associate Member

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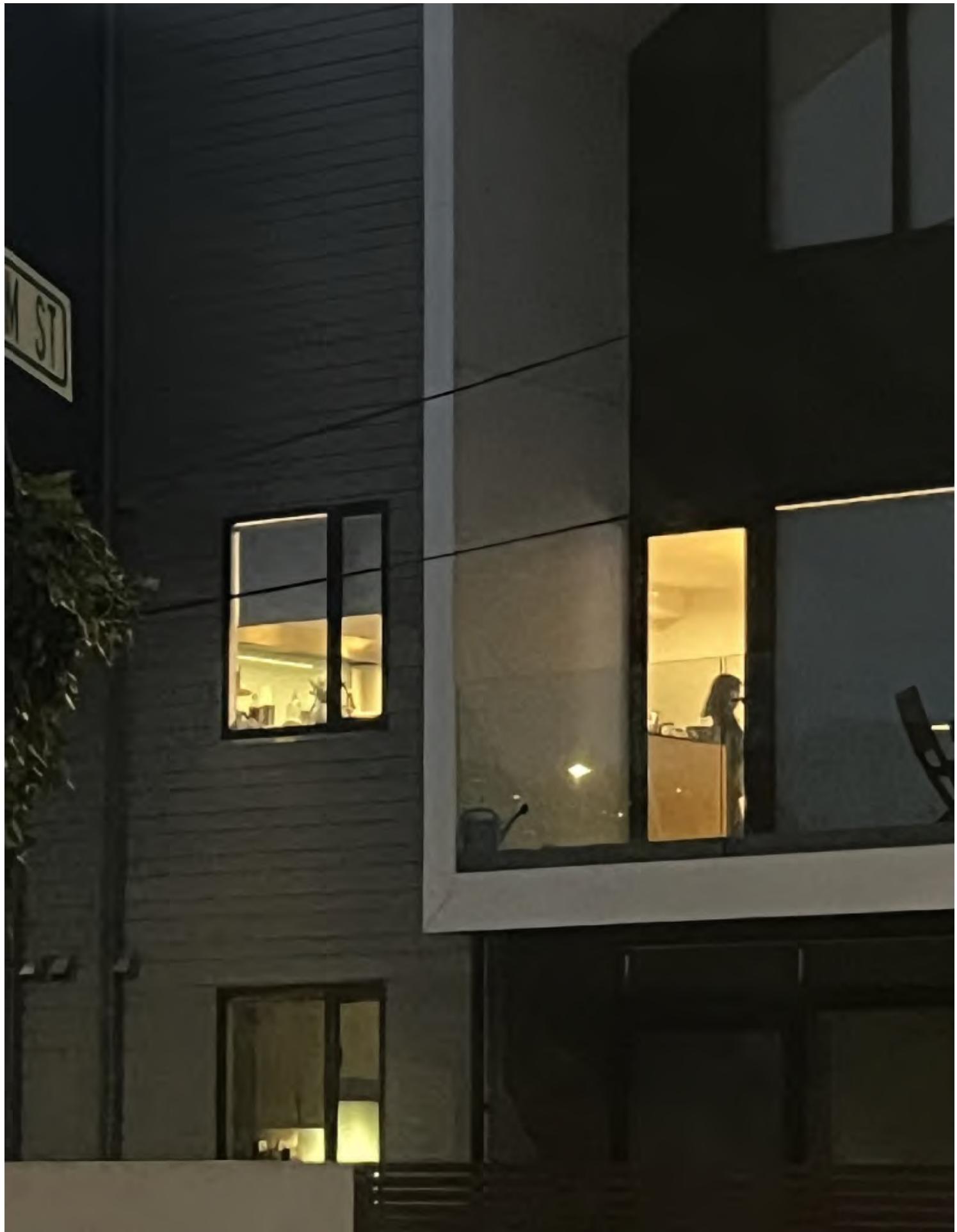




EXHIBIT D

-101-



EXHIBIT D



James and Chantal Euringer on music, love and parenting twins

Sharon Stephenson - 05:00, Nov 21 2020



EXHIBIT D

From: R J WiL <reon@wellingtoninvestigations.co.nz>
Sent: Monday, November 13, 2023 12:05 AM
To: Eckley M. Keach III
Subject: [EXT] Euringer

James and family have returned. At no stage over weekend we're the lights turned on or movement sighted.

See 2 short video showing James walking from lounge to kitchen and back several times in both videos.



Please excuse brevity sent from mobile device:

RJ Viles | Senior Investigator | WIL

Security Technician & Consultant.

NTT Tower, level 16,
157 Lambton Quay,

Mob: 021-562-333
Office; 04-213-9414
Free Call; 0800-787-732

www.wellingtoninvestigations.co.nz

From: R J WiL <reon@wellingtoninvestigations.co.nz>
Sent: Tuesday, November 14, 2023 12:50 PM
To: Eckley M. Keach III
Subject: Re: [EXT] Re: Euringer
Attachments: IMG_0.MOV

Monday night video.
Male of slim Build,

And Tuesday evening, he had door open, seen male but couldn't get him on Video,

I'll look at some options.

Please excuse brevity sent from mobile device:

RJ Viles | Senior Investigator | WIL

Security Technician & Consultant.

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Mob: 021-562-333
Office; 04-213-9414
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On Wed, 15 Nov 2023 at 07:23, Eckley M. Keach III <EKeach@ggtriallaw.com> wrote:

Mr. Viles,

Thank you for the updates. At this point, what options do we have to either serve Euringer personally or serve him by alternative service?

Thanks,

Eckley M. Keach III
Counsel | Greenberg Gross LLP

One Summerlin | [1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135](https://www.greenberggross.com)
Direct 702.777.0876 | Main 702.777.0888
EKeach@GGTrialLaw.com



Los Angeles | Orange County | Las Vegas | New York

From: R J WiL <reon@wellingtoninvestigations.co.nz>
Sent: Monday, November 13, 2023 12:07 AM
To: Eckley M. Keach III <EKeach@GGTrialLaw.com>
Subject: [EXT] Re: Euringer

And apartment had internal car parking, I believe these are linked to apartment 8,

Also have young twins the toys do

Seem to correspond,

Please excuse brevity sent from mobile device:

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Office: 04-213-9414
Free Call: 0800-787-732

www.wellingtoninvestigations.co.nz

On Mon, 13 Nov 2023 at 21:04, R J WiL <reon@wellingtoninvestigations.co.nz> wrote:

James and family have returned. At no stage over weekend we're the lights turned on or movement sighted.

See 2 short video showing James walking from lounge to kitchen and back several times in both videos.



Please excuse brevity sent from mobile device:

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From: R J WiL <reon@wellingtoninvestigations.co.nz>
Sent: Sunday, November 19, 2023 3:30 AM
To: Eckley M. Keach III
Subject: Re: [EXT] Re: Euringer
Attachments: image_123655411.JPG; image_123655411.JPG; image_123655411.JPG; image_123655411.JPG; image_123655411.JPG; image_123655411.JPG

Morning Eckley,
On 9th NOV at 6.53am, onsite 3.5hrs, leaving at 10.40am, not seen, Paid.
I returned at 7.35pm, saying for 1hr, extra.
On 10th Nov, 6.50am, Onsite 3hrs, leaving at 9.40am, Paid.
I returned at 6pm, staying 1hr, extra.
On Monday 13th Nov, 7.50pm, got video of James, 2hrs, extra,
On Tuesday 14th Nov, 7.25pm, door on to deck open, seen but no video or stills, 2hrs,
Wednesday 15th Nov at 9.37am, , 1hr,
On Friday 17th Nov, 4.11pm, I took up observation and parking on a different street so I was looking into the underground car parking,
As a vehicle exited I entered the carpark on foot, noting cars parked and registrations,
Parked side by side were HWK829, and MMTKAR, Running these plates I discovered James Euringer registered owner of HWK829, a Silver sedan Holden Cruze,
At 5.10pm I did see James Euringer drive MMTKAR a Silver Subaru legacy Sedan into the car park. I was not in a position to exit the car and enter the underground car park before the door closed.
I have attended and surveilled the address an additional 8hrs including Friday 17th Nov. If I allow 2hrs to re attend monday or Tuesday then that will be 10hrs extra I have spent.

I would like to propose that I try serve James in person and only if I am successful, then I will charge a further 5hrs. I will do this on a No service no charge basis, .

Let me know if this is acceptable.

Regards Reon Viles

On Fri, Nov 17, 2023 at 4:28 PM R J WiL <reon@wellingtoninvestigations.co.nz> wrote:
Onsite trying to serve Jimmy, I have a plan,

Please excuse brevity sent from mobile device:

RJ Viles | Senior Investigator | WIL

Security Technician & Consultant.

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157 Lambton Quay,

Mob: 021-562-333
Office: 04-213-9414
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On Wed, 15 Nov 2023 at 09:50, R J Wil <reon@wellingtoninvestigations.co.nz> wrote:

Monday night video.

Male of slim Build,

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Mr. Viles,

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Thanks,

Eckley M. Keach III
Counsel | Greenberg Gross LLP

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From: R J WiL <reon@wellingtoninvestigations.co.nz>

Sent: Monday, November 13, 2023 12:07 AM

To: Eckley M. Keach III <EKeach@GGTrialLaw.com>

Subject: [EXT] Re: Euringer

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Seem to correspond,

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On Mon, 13 Nov 2023 at 21:04, R J WiL <reon@wellingtoninvestigations.co.nz> wrote:

James and family have returned. At no stage over weekend we're the lights turned on or movement sighted.

See 2 short video showing James walking from lounge to kitchen and back several times in both videos.



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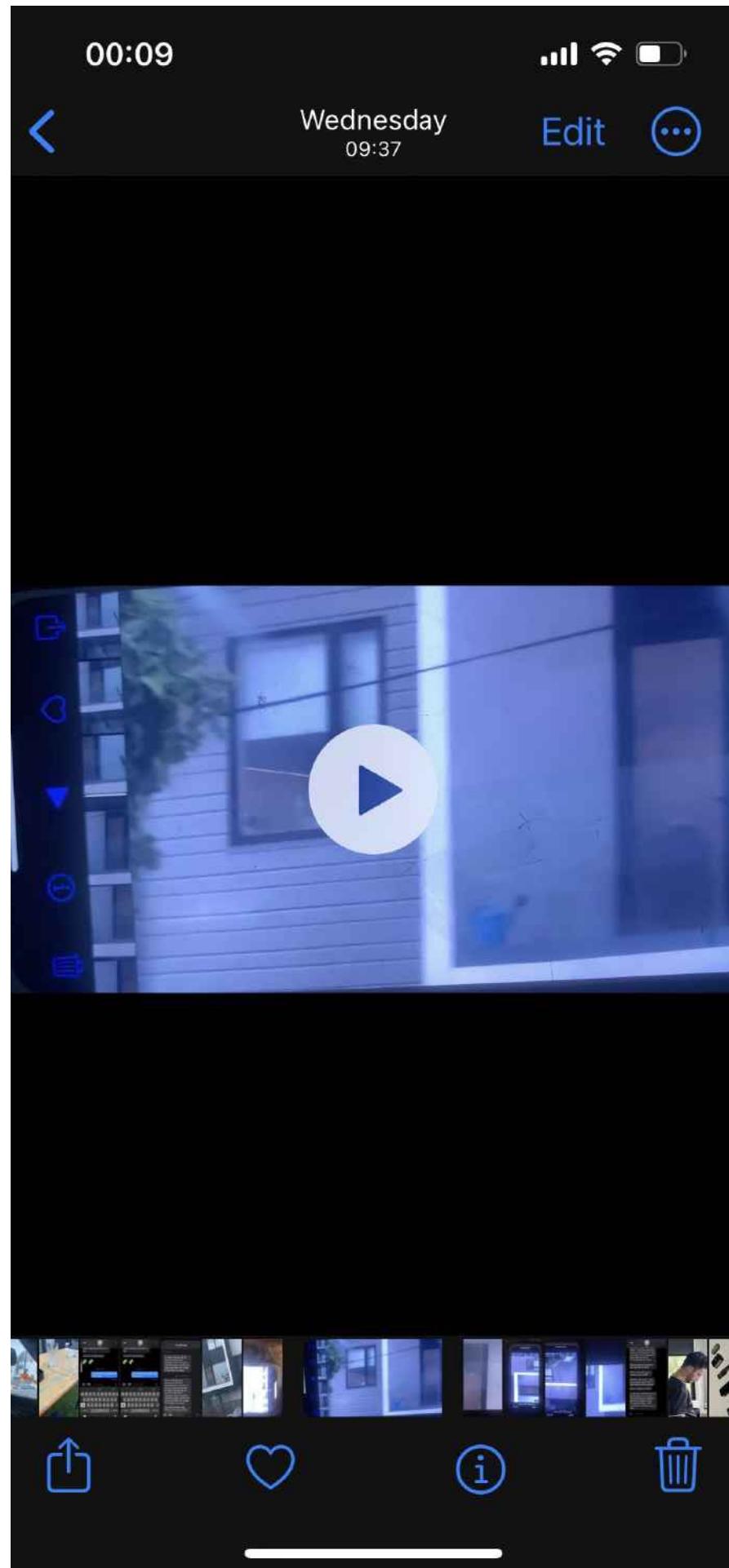


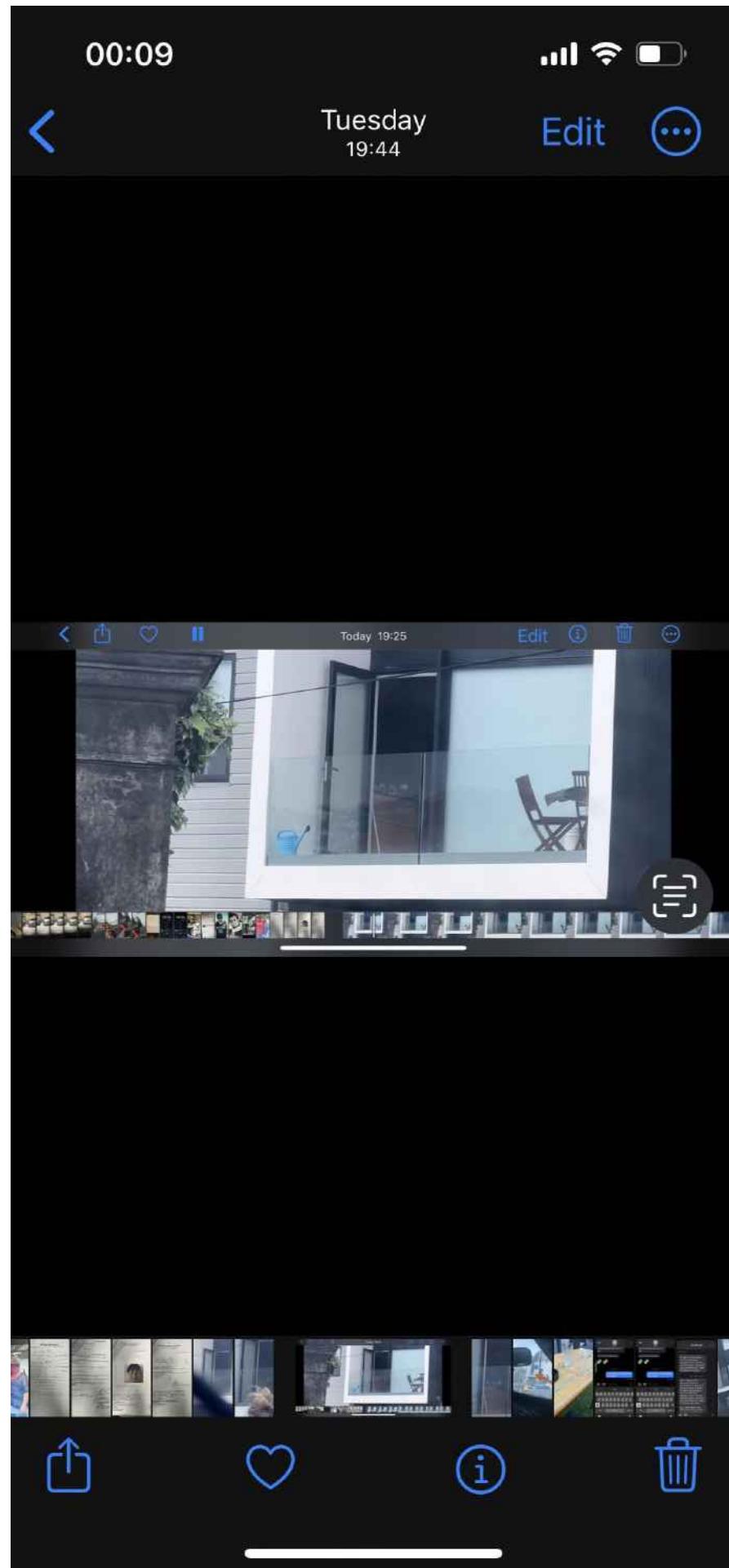
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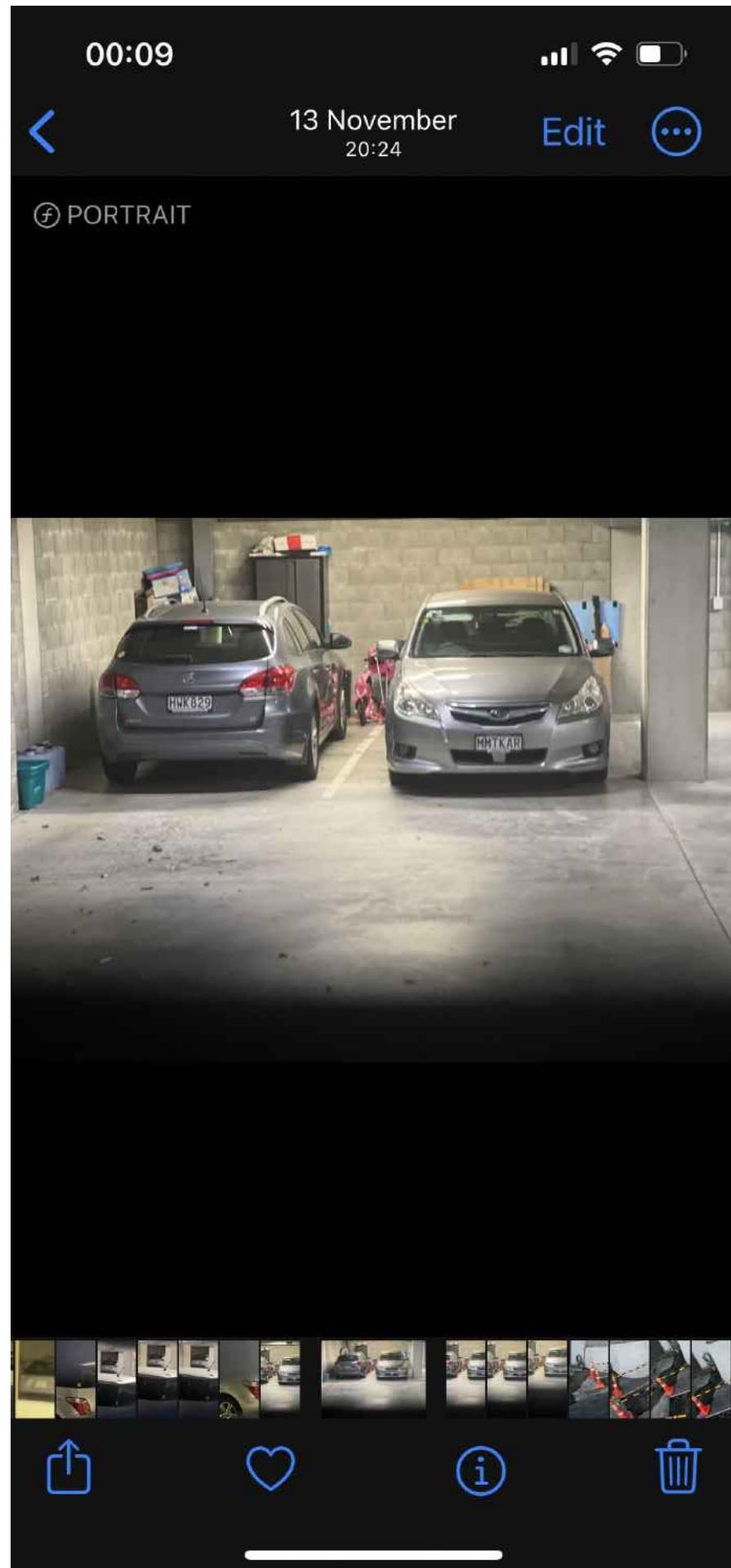
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From: R J WiL <reon@wellingtoninvestigations.co.nz>
Sent: Thursday, November 23, 2023 6:20 PM
To: Eckley M. Keach III
Subject: Re: [EXT] Re: Euringer

No luck on Monday, it's Friday and it was last Friday that I viewed James returning and parking in underground. I did think I would hear from you from my last email on 20th Nov.

Please excuse brevity sent from mobile device:

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EXHIBIT D

-137-

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Sent: Thursday, November 23, 2023 7:39 PM
To: Eckley M. Keach III
Subject: Re: [EXT] Re: Euringer
Attachments: image_67158785.JPG; image_67143425.JPG; image_67172097.JPG; image_67220481.JPG

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EXHIBIT D

-147-



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Sent: Sunday, November 26, 2023 9:20 PM
To: Eckley M. Keach III
Subject: Re: [EXT] Re: Euringer
Attachments: image_67190273.JPG

Always nice to start the week on a win,

Let know how to proceed

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Let me know if this is acceptable.

Regards Reon Viles

On Fri, Nov 17, 2023 at 4:28 PM R J Wil <reon@wellingtoninvestigations.co.nz> wrote:
Onsite trying to serve Jimmy, I have a plan,

Please excuse brevity sent from mobile device:

RJ Viles | Senior Investigator | WIL

Security Technician & Consultant.

NTT Tower, level 16,
157 Lambton Quay,

Mob: 021-562-333
Office: 04-213-9414
Free Call: 0800-787-732

www.wellingtoninvestigations.co.nz

On Wed, 15 Nov 2023 at 09:50, R J Wil <reon@wellingtoninvestigations.co.nz> wrote:
Monday night video.
Male of slim Build,

And Tuesday evening, he had door open, seen male but couldn't get him on Video,

I'll look at some options.

Please excuse brevity sent from mobile device:

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Security Technician & Consultant.

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On Wed, 15 Nov 2023 at 07:23, Eckley M. Keach III <EKeach@ggtriallaw.com> wrote:

Mr. Viles,

Thank you for the updates. At this point, what options do we have to either serve Euringer personally or serve him by alternative service?

Thanks,

Eckley M. Keach III
Counsel | Greenberg Gross LLP

One Summerlin | [1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135](#)
Direct 702.777.0876 | Main 702.777.0888
EKeach@GGTrialLaw.com



Los Angeles | Orange County | Las Vegas | New York

From: R J WiL <recon@wellingtoninvestigations.co.nz>
Sent: Monday, November 13, 2023 12:07 AM
To: Eckley M. Keach III <EKeach@GGTrialLaw.com>
Subject: [EXT] Re: Euringer

And apartment had internal car parking, I believe these are linked to apartment 8,

Also have young twins the toys do

Seem to correspond,

Please excuse brevity sent from mobile device:

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On Mon, 13 Nov 2023 at 21:04, R J Wil <recon@wellingtoninvestigations.co.nz> wrote:

James and family have returned. At no stage over weekend we're the lights turned on or movement sighted.

See 2 short video showing James walking from lounge to kitchen and back several times in both videos.



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--
RJ Viles | Senior Investigator | WIL

MOJ Licensed Security Consultant & Technician

Government License # 23-103616

NZSA - Association Member

Worldwide Association Member - WASP

Certified Fraud Examiner - Associate Member

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